

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

**In the Matter of An Investigation to Determine )  
the Assessment Rate and the Affordable Local )  
Service Rates for Rate-of-Return Regulated ) Docket No. 21-GIMT-095-GIT  
Carriers for the Twenty-Fifth Year of the )  
Kansas Universal Service Fund, Effective )  
March 1, 2021. )**

**VERIZON WIRELESS' MOTION FOR APPROVAL  
OF INTRASTATE ALLOCATION METHODOLOGY**

Cellco Partnership, Topeka Cellular Telephone Company Inc., Alltel Corporation,<sup>1</sup> and Visible Service LLC (together, “Verizon Wireless”) respectfully move the Commission for an order approving their use of a company-specific traffic report for purposes of calculating assessments payable to the Kansas Universal Service Fund (“KUSF”).

1. In support hereof, Verizon Wireless files the accompanying affidavit of Deisy Carrera, Senior Manager, Finance – Regulatory Compliance at Verizon.

2. As explained in more detail in Deisy Carrera’s affidavit, Verizon Wireless utilizes a company-specific traffic report that relies on actual minutes of use (“MOU”) data for both Federal Universal Service Fund (“FUSF”) and KUSF purposes, using the inverse of the federal percentage derived from the report to determine the appropriate percentage for KUSF reporting and remittance purposes. Verizon Wireless has been using this approach since 2009, and last updated its Kansas traffic factor in 2020.<sup>2</sup>

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<sup>1</sup> Alltel Corporation was formerly known as Alltel Communications, LLC. On December 31, 2018, Alltel Communications, LLC merged into Alltel Corporation, with Alltel Corporation being the surviving entity.

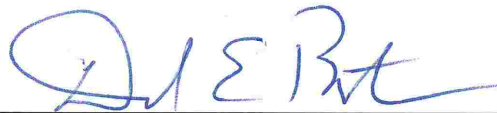
<sup>2</sup> Verizon Wireless (VAW) LLC, Topeka Cellular Telephone Company Inc., Alltel Communications, LLC, and Visible Service LLC filed their last update on April 9, 2020 in Docket 20-GIMT-086-GIT and the Commission approved it by Order dated April 16, 2020.

3. Because the traffic report contains actual MOU data that is proprietary and confidential and constitutes a trade secret, the factors developed using that data are being filed as confidential and under seal.

**WHEREFORE**, Verizon Wireless respectfully request that the Commission enter an order approving Cellco Partnership's, Topeka Cellular Telephone Company Inc.'s, Alltel Corporation's and Visible Service LLC's company-specific traffic report and using the inverse of the federal percentage derived therefrom for KUSF reporting purposes, and for such other relief as is just and proper.

Dated: April 15, 2021

Respectfully submitted,



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*Counsel for Cellco Partnership, Topeka Cellular Telephone Company, Inc., Alltel Corporation, and Visible Service LLC*


**VERIFICATION**

I, Deisy Carrera, being of lawful age and duly sworn, state that I have read the above and foregoing Motion and verify that the statements contained therein are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "DCarrera", written over a horizontal line.

Deisy Carrera

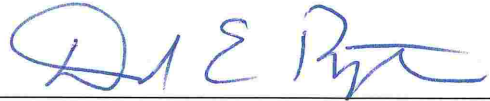
I declare under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. Executed on April 7, 2021.

A handwritten signature in black ink, appearing to read "DCarrera", written over a horizontal line.

Deisy Carrera

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Verizon Wireless' Motion for Approval of Intrastate Allocation Methodology was served via electronic mail this 15th day of April, 2021, to the parties appearing on the Commission's service list.



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David E. Bengtson

# **EXHIBIT “A”**

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

**In the Matter of An Investigation to Determine )  
the Assessment Rate and the Affordable Local )  
Service Rates for Rate-of-Return Regulated )     **Docket No. 21-GIMT-095-GIT**  
Carriers for the Twenty-Fourth Year of the )  
Kansas Universal Service Fund, Effective )  
March 1, 2021. )**

STATE OF NEW JERSEY                     )  
   )  
COUNTY OF SOMERSET                     )

**AFFIDAVIT OF DEISY CARRERA  
ON BEHALF OF VERIZON WIRELESS**

I, Deisy Carrera, being of lawful age and duly sworn, state as follows:

1.       I am employed by Verizon as a Senior Manager – Finance/Regulatory Compliance. In this capacity, I am responsible for, *inter alia*, reporting and remittances relating to the Kansas Universal Service Fund (“KUSF”) for Cellco Partnership, Topeka Cellular Telephone Company Inc., Alltel Corporation, and Visible Service LLC (together, “Verizon Wireless”).

2.       Verizon Wireless’ allocation methodology for KUSF purposes is based on a company-specific traffic report. Verizon Wireless’ company-specific traffic report is used for both Federal Universal Service Fund (“FUSF”) and KUSF purposes. The traffic report is based on actual call origination and termination minutes of use (“MOU”) data obtained from Verizon Wireless’ call detail records, which MOU are classified as interstate, intrastate or international. Verizon Wireless derives the percentage of interstate/international MOU by dividing the number of interstate and international MOU into total MOU. This percentage is accepted by the Federal Communications Commission for FUSF reporting purposes.

3. Verizon Wireless uses the inverse of the federal percentage derived therewith to calculate the percentage for KUSF reporting purposes ( $100\% - \text{FUSF \%} = \text{KUSF \%}$ ). This approach provides a fair and balanced symmetry between federal and state USF programs, and complies with the Commission's directive that carriers use the same allocation methodology for FUSF and KUSF purposes.

4. Verizon Wireless applies the KUSF percentage to its Kansas retail revenues to determine the amount it remits to the KUSF.

5. Verizon Wireless has used, and continues to use, the same methodology described herein at all times since 2009.

6. The intrastate factors used by Verizon Wireless for KUSF purposes for the KUSF reporting period from March 2012 through the present are set forth on the confidential and proprietary attachment to my affidavit.

7. Because the intrastate factors are derived from proprietary and confidential trade secret actual MOU data, the attachment to my affidavit is being filed under seal.

Pursuant to Kan. Stat. Ann. 53-601, I certify that the foregoing is true and correct to the best of my knowledge.



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Deisy Carrera

I declare under penalty of perjury under the laws of Kansas that the foregoing is true and correct.  
Executed on April 7, 2021.



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Deisy Carrera

## Attachment to Deisy Carrera's Affidavit

Verizon Proprietary and Confidential Data					
Active Entities					
RE: Cellco Partnership, Topeka Cellular Telephone Company, Inc., Alltel Corporation, and Visible Service LLC					
KS SUSF Filing Time Period	Intrastate Factor				
03/2012 to 03/2013					
04/2013 to 03/2014					
04/2014 to 03/2015					
04/2015 to 03/2016					
04/2016 to 03/2017					
04/2017 to 03/2018					
04/2018 to 03/2019					
04/2019 to 03/2020					
04/2020 TO 03/2021					
04/2021 forward					